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*Attorneys for defendants
Debashis Bagchi and Jon Bengtson*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

Jaime Martorell, an individual

Plaintiff,

VS+

Debashis Bagchi, an individual and Jon Bengtson, an individual,

Defendants.

CASE NO.: 3:19-cv-00523-MMD-CLB

**Stipulation to Amend the Discovery
Cut-off Deadline**

(Fourth Request)

Tel.: (718) 330-1600 • Fax: (718) 330-1601 • Email: info@nycdiscovery.com
Defendants, Debashis Bagchi and Jon Bengtson, by and through their counsel, Pete
Cladianos III, Esq., and Charles R. Zeh, Esq., The Law Offices of Charles R. Zeh, Esq., and the
plaintiff, Jaime Martorell, by and through his counsel, Anthony Hall, Esq., Simons Hall Johnston
PC, do hereby stipulate and agree to amend the Stipulated Discovery Plan and Scheduling Order
dated October 28, 2019, to extend the deadline for the close of discovery, currently scheduled for
November 16, 2020.

24 This extension of time is sought for the exclusive purpose of allowing a deposition to
25 occur which the attorneys were unable to schedule before the set date for the close of discovery.
26 The discovery completed so far has been the exchange of initial and supplemental disclosures by
27 each side and the exchange of interrogatories and requests for production. All disputes regarding
28 the responses to written discovery are resolved. Both defendants have been deposed. The only

1 remaining discovery to be complete is the deposition of the plaintiff. The attorneys were unable
2 to find a mutually available date until November 20, 2020. Since the scheduled date is beyond
3 the discovery cut off, the parties agree and stipulate to an extension of the date for the end of
4 discovery to November 20, 2020, for the limited purpose of depositing the plaintiff. All other
5 deadlines set forth in this matter shall remain in effect.

6 This is the fourth request for an extension of the close of discovery.

7 Dated: November 12, 2020

Dated: November 12, 2020

8 By: /s/ Anthony Hall, Esq.

Anthony Hall, Esq.
Nevada State Bar No. 5977
Simons Hall Johnston PC
6490 S. McCarran Blvd., Ste. F-46
Reno, NV 89509
Attorneys for plaintiff

By: /s/ Pete Cladianos III, Esq.

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50 West Liberty Street, Suite 950
Reno, NV 89501
Attorneys for defendants

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ORDER

14 IT IS SO ORDERED.

15 Dated this 16 day of November, 2020.



United States Magistrate Judge

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